

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

In re:)	
Harry S. Porterfield,)	Bkrtcy No. 19-00197
Debtor)	
-----)	
Harry S. Porterfield,)	Adversary No. 19-09020
Plaintiff)	
Vs.)	<i>Answer to Plaintiff's Complaint on behalf of</i>
KeyBank National Association and)	<i>Laurel Road Bank (KeyBank National Association)</i>
Campus Federal Credit Union,)	
Defendants)	

Comes Now ***Laurel Road Bank***, and in response to ***Plaintiff's Complaint*** filed herein on or about 14 June 2019 at docket # 1, states:

Introduction

1. Although not named as a Defendant herein specifically, ***Laurel Road Bank*** was served a copy of the ***Summons and Notice*** as well as a copy of the ***Plaintiff's Complaint*** via US mail postmarked on or about 18 June 2019.
2. ***Laurel Road Bank*** was listed as a creditor in this bankruptcy filing arising out of a student loan obligation. ***Plaintiff's Complaint*** seeks relief against not only of ***KeyBank National Association*** but ***Laurel Road Bank*** as well.
3. ***Laurel Road Bank*** is a subsidiary of ***KeyBank National Association*** and ***Laurel Road Bank*** is the current owner and holder of the note(s) for the loan(s) owed by the Plaintiff in the approximate amount of \$459,146.00 for student loan(s) which are the subject matter of ***Plaintiff's Complaint***.
4. ***Laurel Road Bank*** is the true party in interest and represents the interests of ***KeyBank National Association*** in this matter in filing this answer.

Response to Division I – Parties

5. The allegations set out in paragraph one (1) and two (2) are admitted.
6. The allegations set forth in paragraph three (3) are denied for lack of information and belief.

Response to Division II – Jurisdiction and Venue

7. The allegations set forth in paragraphs four (4) through seven (7) are admitted.

Response to Division III – Factual and Procedural Background

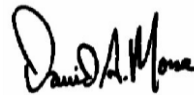
8. The allegations set forth in paragraphs eight (8) through twenty-two (22) are denied.

9. The allegations set forth in paragraph twenty-three (23) are admitted.
10. The allegations set forth in paragraph twenty-four (24) are admitted in part and denied in part. **Laurel Road Bank** admits that the loan obligation is now in excess of \$460,000 plus accruing interest. **Laurel Road Bank** states that the obligation in question is owed to **Laurel Road Bank** rather than KeyBank.
11. The allegations set forth in paragraphs twenty-five (25) is denied for lack of information and belief.
12. The allegations set forth in paragraph twenty-six (26) through twenty-eight (28) are denied.

Response to Division IV – Claims for Relief

13. The responses to paragraphs one (1) through twenty-eight (28) above are incorporated herein verbatim.
14. The allegations set forth in paragraph thirty (30) are denied. Plaintiff's student loan debts which are the subject matter of this litigation non-dischargeable
15. The allegations set forth in paragraph thirty-one (31) do not appear to require a response. To the extent a response is required, **Laurel Road Bank** denies that the student loan debts should be included in the general discharge in this case.
16. The responses to paragraphs one (1) through thirty-(31) above are incorporated herein verbatim.
17. The allegations set forth in paragraph thirty-three (33) are denied.
18. The allegations set forth in paragraph thirty-four (34) are denied.
19. The allegations set forth in paragraph thirty-five (35) do not appear to require a response.

WHEREFORE, **Laurel Road Bank** prays **Plaintiff's Complaint** be dismissed at Plaintiff's cost.



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PROOF OF SERVICE

The undersigned certifies the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record (or *pro se* parties) herein at their respective addresses disclosed on the pleadings on 12 July 2019 via upload to the Court's CM-ECF docketing system.



Signature _____